

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**TALECRIS BIOTHERAPEUTICS, INC., and
BAYER HEALTHCARE LLC,**

Plaintiffs,

v.

**BAXTER INTERNATIONAL INC., and
BAXTER HEALTHCARE CORPORATION,

Defendants.**

C.A. No. 05-349-GMS

Jury Trial Demanded

**BAXTER HEALTHCARE CORPORATION,

Counterclaimant,**

v.

**TALECRIS BIOTHERAPEUTICS, INC., and
BAYER HEALTHCARE LLC,

Counterdefendants.**

PLAINTIFFS' NOTICE OF DEPOSITION OF HANS PETER SCHWARZ

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on September 25, 2006 at 9:30 a.m., at the Hotel Imperial, Kaerntner Ring 16, Vienna 1015, Austria, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Hans Peter Schwarz.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: August 28, 2006

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/s/ Jeffrey B. Bove

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CERTIFICATE OF SERVICE

I, JEFFREY B. BOVE, do hereby certify that I caused a true copy of the foregoing document, **PLAINTIFFS' NOTICE OF DEPOSITION OF HANS PETER SCHWARZ**, to be served upon the below listed in the manner indicated on August 28, 2006.

Via Hand Delivery and E-Mail

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By: /s/ Jeffrey B. Bove
Jeffrey B. Bove (# 998)